

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
South Central Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Addendum to the October 7, 2002 Statement of Legal and Factual Basis

INTERMET Archer Creek Foundry
Campbell County, Virginia
Permit No. SCRO30121

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, INTERMET Archer Creek Foundry has applied for a significant modification to their Title V Operating Permit for its Campbell County, Virginia facility. The Department has reviewed the application and has prepared a significant modification for the Title V Operating Permit.

Engineer/Permit Contact: DRAFT/PROPOSED Date:
Patrick Corbett
(434) 582-6230

Air Permit Manager: _____ Date:
David J. Brown

Regional Director: _____ Date:
T. L. Henderson

1. FACILITY INFORMATION

Permittee

Intermet Archer Creek Foundry
P.O. Box 11589
Lynchburg, VA 24506

Facility

Intermet Archer Creek Foundry
1132 Mt. Athos Road, Campbell County, Virginia
County Plant ID No. 51-031-00101

2. SOURCE DESCRIPTION

NAICS/SIC Code – 331511/3321 – Intermet Archer Creek Foundry is a manufacturer of gray and ductile iron parts for the automotive and other industries from scrap metal and foundry returns. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week, fifty-two (52) weeks per year. The facility is permitted to melt 299,400 tons of metal per year.

3. EMISSIONS SUMMARY:

PLANTWIDE EMISSIONS SUMMARY [TONS PER YEAR]	
CRITERIA POLLUTANTS	POTENTIAL EMISSIONS
Particulate Matter (PM10)	498.1
Nitrogen Oxides (NOx)	79.2
Sulfur Dioxide (SO2)	20.3
Carbon Monoxide (CO)	34.8
Volatile Organic Compounds (VOC)	130.9

This facility has the potential to emit 498 tons per year of PM-10 and 131 tons per year of VOC. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, Intermet Archer Creek Foundry is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 9 VAC 5 Chapter 80 Article 1.

4. SIGNIFICANT PERMIT MODIFICATION INFORMATION

This significant permit modification is being generated to incorporate a change in INTERMET's New Source Review Permit dated December 23, 2004. This permit has since been amended and is now dated December 7, 2006 (hereafter referred to as the NSR permit). Changes made during the latest NSR approval include the shutdown of equipment. Conditions pertaining to this equipment now permanently shutdown have not been incorporated into this significant modification. The NSR approval necessitating this modification is the preconstruction approval

for the use of a new resin. While the new resin has a lower VOC content, empirical data show VOC emissions per pound of resin were actually higher. The resulting permit action retained the emission limits contained in Condition XI.A.5 and lowered the allowable annual resin usage in Condition XI.A.2. The project did not contravene any condition of this Title V permit; hence, incorporation was not required prior to use of the new resins. The Title V permit modification application was received on December 22, 2005, less than twelve months after the unit became subject to these requirements, and deemed timely and complete on that date. A completeness determination letter was sent on January 27, 2006. The application was deemed technically complete on November 20, 2006, after completion of the mutual shutdown agreement.

This significant Title V permit modification also includes general references to the applicable requirements for the facility from the following National Emission Standards for Hazardous Air Pollutants: Iron and Steel Foundries (Subpart EEEEE); Surface Coating of Miscellaneous Metal Parts and Products (Subpart MMMM); Industrial, Commercial and Institutional Boilers and Process Heaters (Subpart DDDDD) and the Organic Liquids Distribution [non-gasoline] (Subpart EEEE). The permit expires on October 7, 2007.

Finally, this significant Title V permit modification updates the applicable requirements to match the current Title V permit boilerplate language and the NSR permit condition sequence.

5. COMPLIANCE STATUS

For Title V permitting purposes, discussion of the compliance status is considered relevant to determining whether a compliance plan must be included in the Title V permit. Based on compliance evaluations, no issues associated with this facility require compliance plan development.

6. EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emission units and control devices at INTERMET remain as described in the Statement of Basis dated October 7, 2002. The significant modification is based on the lowering of resin usage in the coremaking area.

7. EMISSION UNIT APPLICABLE REQUIREMENTS REVISIONS

The requirements are taken from the NSR permit. These conditions are to be added to the Title V permit with this significant modification.

7.1 Limitations

The permit limits established in the NSR permit are unchanged with the exception of the resin usage limitation for coremaking. This limit, Condition 12 of the NSR permit, was reduced from 1,200 tons per year (TPY) to 722 TPY. The reduction enabled INTERMET to retain the emissions limitations in the NSR permit. This reduction in usage is reflected in Condition XI.A.2 of the Title V permit.

7.2 Testing

No changes to the testing requirements due to the resin usage change.

7.3 Periodic Monitoring

No periodic monitoring is required for this resin usage change.

With regards to all periodic monitoring requirements for VEE, the wording “15-second” was added before “observation” clarify that any single Method 9 observation greater than the stated percentage would trigger a 60 minute Method 9. This addition is due to ensure clarity for sources regarding these applicable requirements. The wording does not change the intent or enforceability of these conditions.

7.4 Recordkeeping

The recordkeeping provisions are unchanged. Resin usage records are still required to show compliance with the usage limitation. These records include throughput on a rolling 12-month basis. All records must be maintained on site for a period of 5 years and be made available upon request.

7.5 Reporting

The permittee shall comply with the reporting requirements established in accordance with General Condition No. VII.C – VII.F of the Title V permit.

Initial notifications required for this resin change have been met and as such were not included in this modification.

8. APPLICABLE MACT REQUIREMENTS (40 CFR 63 SUBPARTS EEEE, MMMM, DDDDD, AND EEEEE)

For each applicable MACT, a general requirement of compliance by the applicable compliance date is included. This permit expires on October 7, 2007.

9. COMPLIANCE ASSURANCE MONITORING (CAM)

In accordance with the requirements of 40 CFR 64, Compliance Assurance Monitoring (CAM), review for CAM applicability has been completed. The three conditions that must be met for an emissions unit to be subject to CAM are:

1. emits or has the potential to emit (in the absence of add-on control devices) quantities of one or more regulated air pollutants that exceed major source thresholds,
2. is subject to one or more emission limitations for the regulated air pollutant(s) for which it is major before control, and
3. uses a control device to achieve compliance with one or more of these emission limitations.

A unit must meet all three conditions to be subject to CAM. For an amendment, only the units affected by the proposed change are reviewed. The resin usage limits emissions from coremaking operation to 22.08 TPY VOC. There are no other units affected by this significant amendment. Therefore, no CAM units are associated with this project.

10. SUPPLEMENT ENVIRONMENTAL PROJECT SCHEDULE

There is no Supplemental Environmental Project (SEP) associated with this facility.

11. GENERAL CONDITIONS

The General Conditions have been updated to comply with the current boilerplate.

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

12. CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

13. PUBLIC PARTICIPATION

The public notice for this Draft and Proposed significant modification to the Title V permit appeared in the Lynchburg News & Advance on January 20, 2007.

Public comment period beginning date: January 21, 2007
Public comment period ending date: February 19, 2007

All written comments should be addressed to the following individual and office:

Patrick Corbett
Senior Environmental Engineer
Virginia Department of Environmental Quality
South Central Regional Office
7705 Timberlake Road
Lynchburg, VA 24502
Phone: (434) 582-5120 ext. 6030
Fax: (434) 582-5125
ptcorbett@deq.virginia.gov